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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
SOUTHERN DIVISION**

**IN RE:**

**CASE: 21-22634**

CRESTON RYAN ANDERSON  
LETTIE KAE ANDERSON

**CHAPTER 13  
Hon. WILLIAM T. THURMAN**

**Debtors**

Hearing: 03/02/2022

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**TRUSTEE'S RESPONSE TO MOTION TO MODIFY CHAPTER 13 PLAN**

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Lon A. Jenkins, Chapter 13 Trustee, by and through counsel, hereby responds to the above-referenced Motion as follows:

1. As of the date of this response, the Debtors are current on plan payments.
2. The Debtor seeks to modify the plan to increase the return to 100%, provide for direct payment of claim 6 - Navient Solutions and increase plan payment to \$1,330 commencing February 2022.
3. The Debtors should file an amended budget and provide updated pay advices prior to the hearing date. The Trustee opposes the Motion without these documents being provided ahead of time.
4. The case is feasible with the proposed modification.
5. Unless a fee application is filed, the Trustee objects to an Order granting fees and costs because the Motion does not comply with 11 U.S.C. § 330 or Fed. R. Bankr. P. 2016.

WHEREFORE, the Trustee objects to entry of an Order granting the relief requested in the Motion.

Dated: February 16, 2022

/s/ Tami Gadd  
Chapter 13 Trustee

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing Trustee's Response was served on the following parties on February 16, 2022:

THERON D. MORRISON, ECF Notification

/s/ Tami Gadd